EXHIBIT J

TILED: NEW YORK COUNTY CLERK 04/05/2019 05:42 PM INDEX NO. 157733/2016

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Cathy Fleming

From:

Elisabeth Conroy < meconroy@515law.com>

Sent:

Thursday, July 26, 2018 4:05 PM

To:

Cathy Fleming

Subject:

RE: Ray v. DiTomasso Discovery

Hi Cathy.

I have been informed that our client is unable to be deposed on August 7. My apologies. He is working on dates and I will give them to you as soon as I have them.

Best, Elisabeth

M. Elisabeth Conroy Edward W. Hayes, P.C. 515 Madison Avenue, 31st Floor New York, New York 10022

Tel: 212-644-0303 Fax: 212-935-6424

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From: Cathy Fleming [mailto:cfleming@flemingruvoldt.com]

Sent: Tuesday, July 24, 2018 3:59 PM

To: Elisabeth Conroy <meconroy@515law.com>

Subject: Re: Ray v. DiTomasso Discovery

August 7 works.

Sent from my iPhone

On Jul 24, 2018, at 3:54 PM, Elisabeth Conroy <meconroy@515law.com> wrote:

Hi Cathy,

Would Tuesday, August 7 work for Larry's deposition? I understand we would have to move Mr. DiTommaso's deposition to a later date.

All the best, Elisabeth

M. Elisabeth Conroy Edward W. Hayes, P.C. 515 Madison Avenue, 31st Floor New York, New York 10022

Tel: 212-644-0303 Fax: 212-935-6424

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From: Cathy Fleming [mailto:cfleming@flemingruvoldt.com]

Sent: Monday, July 16, 2018 6:13 PM

To: Elisabeth Conroy < meconroy@515law.com>

Subject: Re: Ray v. DiTomasso Discovery

Ok but he goes first.

Sent from my iPhone

On Jul 16, 2018, at 4:52 PM, Elisabeth Conroy < meconroy@515law.com > wrote:

Hi Cathy,

I'm sorry but we need to adjourn Wednesday. I will check with our client and get back to you with dates.

Best, Elisabeth

M. Elisabeth Conroy Edward W. Hayes, P.C. 515 Madison Avenue, 31st Floor New York, New York 10022

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From: Cathy Fleming [mailto:cfleming@flemingruvoldt.com]

Sent: Monday, July 16, 2018 3:01 PM

To: Elisabeth Conroy <meconroy@515law.com>

Subject: RE: Ray v. DiTomasso Discovery

Hi Elisabeth. Have you confirmed Wednesday, July 18 for Larry's deposition? I have not received some of the doctor's records yet, but I have enough to start.

From: Elisabeth Conroy < meconroy@515law.com>

Sent: Thursday, May 3, 2018 11:14 AM

To: Cathy Fleming <cfleming@flemingruvoldt.com>

Subject: RE: Ray v. DiTomasso Discovery

Hi Cathy,

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Thank you for this information. We will speak to Larry at the earliest opportunity to find out how far back he will authorize us to go with the HIPAA forms.

Best regards, Elisabeth

M. Elisabeth Conroy Edward W. Hayes, P.C. 515 Madison Avenue, 31st Floor New York, New York 10022

Tel: 212-644-0303 Fax: 212-935-6424

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From: Cathy Fleming [mailto:cfleming@flemingruvoldt.com]

Sent: Wednesday, May 02, 2018 1:11 PM

To: Elisabeth Conroy <<u>meconroy@515law.com</u>>
Cc: Edward W. Hayes <<u>ehayes@515law.com</u>>
Subject: Re: Ray v. DiTomasso Discovery

Hi Elisabeth. Frank didn't testify at his Bronx trial.

I do not see the relevance of a hearing many years ago, and I don't have any dox from the nj casino case, but without waiving objections I will see if the client has any dox.

Sent from my iPhone

On May 2, 2018, at 12:43 PM, Elisabeth Conroy < meconroy@515law.com > wrote:

We are still checking with our client regarding the date.

Our firm has not received any discovery from Mr. DiTommaso, particularly documents relating to his hearing in front of the State of New Jersey Casino Control Commission.

As a heads up, we are also sending a supplemental discovery demand seeking transcripts of Mr. DiTommaso's cross-examination in his case in Bronx County which you should receive within the next week.

Thank you, Elisabeth

M. Elisabeth Conroy Edward W. Hayes, P.C. 515 Madison Avenue, 31st Floor New York, New York 10022

Tel: 212-644-0303 Fax: 212-935-6424 TILED: NEW YORK COUNTY CLERK 04/05/2019 05:42 PM INDEX NO. 157733/2016

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From: Cathy Fleming [mailto:cfleming@flemingruvoldt.com]

Sent: Monday, April 30, 2018 4:26 PM

To: Elisabeth Conroy < meconroy@515law.com >

Subject: RE: Ray v. DiTomasso Discovery

To the first time he had a complaint which I believe goes back to the early 1990s.

From: Elisabeth Conroy < meconroy@515law.com >

Sent: Monday, April 30, 2018 4:21 PM

To: Cathy Fleming < cfleming@flemingruvoldt.com >

Cc: Edward W. Hayes < ehayes@515law.com Subject: RE: Ray v. DiTomasso Discovery

Not a problem. How far back would you like the forms to go?

M. Elisabeth Conroy Edward W. Hayes, P.C. 515 Madison Avenue, 31st Floor New York, New York 10022

Tel: 212-644-0303 Fax: 212-935-6424

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From: Cathy Fleming [mailto:cfleming@flemingruvoldt.com]

Sent: Monday, April 30, 2018 4:14 PM

To: Elisabeth Conroy < meconroy@515law.com > Cc: Edward W. Hayes < ehayes@515law.com > Subject: RE: Ray v. DiTomasso Discovery

We received the Verified Bill of Particulars and Response to Combined Discovery Demands. We have signed HIPPA forms for three doctors (Felix, Mindel Opthamology, Govindaraj) and one hospital (NY Pres Weill Cornell), but they are only for Medical Records for 9/18/2015 to the present and do not include the entire medical record, including patient histories, office notes, test results, radiology studies, etc. We seek the full medical histories and HIPPA forms for all of Mr. Ray's doctors.

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From: Elisabeth Conroy < meconroy@515law.com >

Sent: Monday, April 30, 2018 3:57 PM

To: Cathy Fleming < cfleming@flemingruvoldt.com > Cc: Edward W. Hayes < ehayes@515law.com >

Subject: Ray v. DiTomasso Discovery

Dear Ms. Fleming:

We sent the Verified Bill of Particulars, as well as Plaintiff's Response to Defendant's Combined Discovery Demands on April 6 to your offices located at 1700 Broadway (see attached FedEx receipt). We can re-send but would have to have our client come in again to re-sign the HIPAA forms.

Best wishes, Elisabeth Conroy

Edward W. Hayes, P.C. 515 Madison Avenue, 31st Floor New York, New York 10022

Tel: 212-644-0303 Fax: 212-935-6424

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